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CERTIFICATE OF CONFERRAL

I, Benjamin D. Webb, as counsel for the movant, Defendant, Michael Russin, hereby

certify that I have made good faith efforts to confer with the non-moving party to determine

whether she consents or opposes the foregoing Motion to Stay. On October 9, 2023, I sent counsel

for the Plaintiff correspondence via electronic mail requesting her consent to file this motion to

stay. Counsel for Plaintiff has not responded. I followed up via email on October 12, and October

18, via electronic mail and telephone, and have not received a response.

Dated: October 18, 2023 s/Benjamin D. Webb

Benjamin D. Webb